

EXHIBIT “C”



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Transcript of Ronald Browning, Jr.

Date: April 22, 2024
Case: Warnick -v- Delmarva Power & Light Co.

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Conducted on April 22, 2024

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1 Q Are you at all familiar, as you sit here 10:11:13
2 today, with NFPA 70B recommended practice for 10:11:16
3 electrical equipment maintenance? 10:11:21
4 A No. 10:11:23
5 Q When you worked as a -- in your position 10:11:23
6 as a reliability engineer for Delmarva, were there 10:11:39
7 any particular rules or standards that you 10:11:41
8 referred to in your job? 10:11:47
9 A Our internal standards. 10:11:50
10 Q Okay. 10:11:52
11 A As well as our reliability or our 10:11:52
12 reliability metrics are what we based our projects 10:11:57
13 off of. 10:12:02
14 Q Okay. And what are those internal 10:12:03
15 standards called? 10:12:05
16 A We have construction standards, material 10:12:11
17 standards and then distribution standards. 10:12:18
18 Q Okay. And how are they -- are they in a 10:12:28
19 booklet? Are they online? How do you access 10:12:32
20 those standards? 10:12:34
21 A So they used to be handed to us in 10:12:34
22 binders and kept up with -- via our standards 10:12:39

1 department. We have an internal standards 10:12:46
2 department but they have since gone to a 10:12:49
3 SharePoint website. 10:12:51
4 Q Are there still copies of binders 10:12:57
5 around? 10:12:58
6 A Not that I'm aware of. I believe most 10:13:00
7 of the folks that use them have since retired or 10:13:03
8 had them hidden because they were sought out after 10:13:08
9 our reproduction. Our repo team was kind of 10:13:11
10 dissembled so we weren't able to get those as 10:13:11
11 easily. 10:13:21
12 Q Not able to get to the paper binders? 10:13:23
13 A Correct. 10:13:26
14 Q And so after that conversion, the way to 10:13:26
15 access that information was online? 10:13:32
16 A Correct. 10:13:34
17 Q And when did that conversion happen? 10:13:38
18 A Oh, goodness. I would say 2020, 10:13:43
19 estimating. 10:13:47
20 Q And for -- when you worked in 10:13:59
21 reliability engineering, was there a particular, 10:14:05
22 of the three types of standards that you 10:14:08

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1	Q	Okay. Well, so --	10:33:35
2	A	Prior to going in.	10:33:36
3	Q	Was the lock on that door a Delmarva	10:33:38
4		lock?	10:33:42
5	A	No.	10:33:43
6	Q	Okay. And do you know who controlled	10:33:49
7		the lock on the door at Sea Colony?	10:33:57
8	A	Sea Colony HOAs.	10:34:02
9	Q	Okay. Before -- when -- do you know	10:34:16
10		when in time it was that you saw this type of	10:34:39
11		switch at Sea Colony?	10:34:43
12	A	Early -- estimating early 2019. I know	10:34:46
13		it was 2019. I want to say January or February.	10:34:49
14	Q	And was it around the same time that you	10:34:58
15		saw the knife blade switches at Oceana?	10:35:02
16	A	Correct.	10:35:17
17	Q	And before that, had you ever seen a	10:35:17
18		knife blade switch in your life?	10:35:21
19	A	In pictures and on our standards manual.	10:35:24
20	Q	Where are the knife blade switches	10:35:32
21		pictured in the standards manual?	10:35:34
22	A	In the materials manual. I don't recall	10:35:38

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1 are others? 10:40:57

2 A These are all the photos that I took. 10:41:03

3 Q Okay. 10:41:07

4 A Of Sea Colony as well as at the Oceana? 10:41:07

5 Q Okay. 10:41:10

6 MR. FOLEY: So Mr. Browning forwarded me 10:41:12

7 the photos and I forwarded you. I think I made 10:41:14

8 that representation. 10:41:14

9 Q Okay. And so where are these photos 10:41:19

10 maintained by you? 10:41:22

11 A They were in my old reliability folder 10:41:25

12 on our shared drive but I tried to access the 10:41:29

13 whole folder the other day and I lost a bunch of 10:41:33

14 information or I don't have access to it anymore. 10:41:37

15 Q Okay. And so when you went to Sea 10:41:41

16 Colony, who was with you? 10:41:51

17 A Oh, a trouble and service man which we 10:41:55

18 also refer to as our switch persons and one 10:41:59

19 supervisor, or actually two supervisors and 10:42:08

20 Patrick Dubinski, estimating. 10:42:16

21 Q Okay. Who was the trouble and service 10:42:17

22 man when you went up? 10:42:24

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1 little bit of a larger trip than what I put 11:30:18
2 together at Sea Colony to go through. We went 11:30:22
3 through two different places in Ocean City but I 11:30:26
4 only had my iPad on me for the one at the Oceana. 11:30:32
5 Q Okay. So we were provided with a set of 11:30:40
6 photos under the label Ocean City and it's 48 11:30:45
7 photos, and are these all photos just of the 11:30:53
8 Oceana condo? 11:31:00
9 A Correct. 11:31:02
10 MR. FOLEY: Just so we're on the same -- 11:31:02
11 you're referring now to Exhibit 2, correct? 11:31:02
12 MR. TIMONEY: Yes, sorry, Browning 2. 11:31:02
13 Yes. 11:31:02
14 Q Okay. And when you -- first off, why 11:31:16
15 did you and Patrick decide to go to Ocean City? 11:31:23
16 A Because Ocean City has high-rises just 11:31:28
17 as Sea Colony so they're similar to Sea Colony. 11:31:33
18 So I figured if he's seeing the same issues that I 11:31:39
19 am and also hearing the same stories that I am, 11:31:44
20 let's go take a look and see if we can get a plan 11:31:46
21 together to make all this infrastructure better. 11:31:46
22 Q Okay. And so were there e-mails between 11:31:55

1 you and Patrick Dubinski as to what you were doing 11:31:57
2 or planning to do or the reason for the trip? 11:31:57
3 A Oh, I'm sure. There's probably e-mails, 11:32:03
4 phone calls. 11:32:06
5 Q All right. And did your supervisor know 11:32:11
6 you were going to Ocean City? 11:32:17
7 A Correct. 11:32:19
8 Q And was it the same supervisor? 11:32:19
9 A Yes. 11:32:23
10 Q And did your supervisor have any input 11:32:23
11 into what you should look for or photograph when 11:32:25
12 you went there? 11:32:25
13 A No. 11:32:28
14 Q Did your supervisor review the 11:32:29
15 photographs that you took at Sea Colony? 11:32:31
16 A I don't recall. I believe I may have 11:32:34
17 showed her but I can't confirm. 11:32:39
18 Q And did you have any conversations with 11:32:42
19 anyone else at Delmarva about seeing an issue at 11:32:45
20 Sea Colony with unauthorized access to electrical 11:32:51
21 rooms? 11:32:56
22 MR. FOLEY: Objection, form and 11:32:59